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Attorney for Proposed Intervenors

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION—LOS ANGELES**

YITZCHOK FRANKEL; ) Case No. 2:24-cv-04702-MCS-  
 JOSHUA GHAYOUM; )  
 EDEN SHEMUELIAN, and )  
 DR. KAMRAN SHAMSA )  
 Plaintiffs, )

vs. )

REGENTS OF THE UNIVERSITY OF ) **DECLARATION OF THOMAS**  
 CALIFORNIA; MICHAEL V. DRAKE, ) **HARVEY IN SUPPORT OF**  
 President of the University of California; ) **MOTION FOR LEAVE TO**  
 GENE D. BLOCK, Chancellor, University ) **INTERVENE**  
 of California, Los Angeles; DARNELL )  
 HUNT, Executive Vice-President and )  
 Provost; MICHAEL BECK, )  
 Administrative Vice Chancellor; )  
 MONROE GORDEN, JR., Vice )  
 Chancellor; and RICK BRAZIEL, )  
 Assistant Vice Chancellor, each in both )  
 his official and personal capacities, ) **Judge: Hon. Mark C. Scarsi**

Defendants. )

**DECLARATION OF THOMAS B. HARVEY**

I, Thomas B. Harvey, declare as follows pursuant to 28 U.S.C. § 1746 under penalty of perjury:

1. I am an attorney at law duly licensed to practice before all courts in the State of California and am a member of the bar of this Court. If called upon to do so, I could and would testify competently to the following based on firsthand knowledge.

2. I met with Counsel for Plaintiffs on April 24, 2025 by phone. We were not able to resolve the issues raised in Proposed Intervenor's Motion for Leave to Intervene. After exchanging emails following up on our conversation, Counsel informed me that Plaintiffs oppose intervention.

3. I met with Counsel for Defendants on April 25, 2025 by phone. We were not able to resolve the issues raised in Proposed Intervenor's Motion for Leave to Intervene. After exchanging emails following up on our conversation, Counsel informed me that Defendants take no position on intervention.

4. The Motion was filed on May 2, 2025 and the parties filed a Joint Stipulation detailing a briefing schedule. Plaintiffs filed their Opposition to the Motion for Leave to Intervene on May 20, 2025.

5. Plaintiffs' Opposition noted that Proposed Intervenor's Motion was not accompanied by a pleading.

6. I emailed counsel for Plaintiffs on May 29, 2025 proposing a resolution by which I would cure the technical deficiency by including an Answer to the First Amended Complaint as an attachment to the Reply, due on June 2, 2025.

7. Plaintiffs' counsel did not respond to that email.

8. Unable to resolve the issue with Plaintiffs' counsel, I filed a Motion to Withdraw the Motion for Leave to Intervene (originally filed on May 2, 2025) and refiled that same motion on June 2, 2025. The motion filed on June 2, 2025 is identical to the previously filed motion other than the filing and service dates.

1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct. Executed this 2nd day of June, 2025, at Los Angeles,  
3 California.

4 /s/Thomas B. Harvey

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